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6 Attorneys for Defendant
ORACLE AMERICA, INC
7

8 UNITED STATES DISTRICT COURT
9 NORTHERN DISTRICT OF CALIFORNIA
10

11 MARY E. MOWRY

12 Plaintiff,

13 v.

14 ORACLE AMERICA, INC., a corporation

15 Defendant.
16

Case No. 3:18-cv-07028 VC

DECLARATION OF PRINCE VARMA IN
SUPPORT OF DEFENDANT'S REPLY
BRIEF IN SUPPORT OF ITS MOTION TO
DISMISS PURSUANT TO FEDERAL RULE
OF CIVIL PROCEDURE 12(b)(3), OR IN
THE ALTERNATIVE, TO TRANSFER
VENUE PURSUANT TO 28 U.S.C. § 1406(a)
AND/OR § 1404(a)

17 Date: March 7, 2019
18 Time: 10:00 a.m.
Location: Courtroom 4, 17th Floor
19 Judge: Hon. Vince Chhabria

20 Complaint Filed: November 1, 2018
Trial Date: None set
21

1 I, Prince Varma, hereby declare and state as follows:

2 1. I am currently employed by Oracle America, Inc. ("Oracle") as Vice President of
3 Sales for Oracle Financial Services Analytical Applications ("OFSAA"), Europe, Middle East and
4 Africa. I currently work in London, England. I have personal knowledge of all of the facts set forth
5 below, unless otherwise stated, and if called upon to testify to the same, I could and would do so
6 competently and truthfully under oath.

7 2. From 2003 until October 2018, I worked for Oracle in Indianapolis, Indiana as Senior
8 Sales Director for OFSAA North America. I have never been based out of California during my
9 employment with Oracle.

10 3. Mary Mowry ("Mowry") worked as an Application Sales Representative ("ASR") on
11 my sales team during her employment with Oracle from January 2014 until June 2017. During her
12 tenure at Oracle, Jason Yesinko and I were Mowry's managers, and she worked in Charlotte, North
13 Carolina.

14 4. As an ASR, Mowry handled the Southeastern Territory and her travel for work would
15 cover North Carolina, South Carolina, Texas, Florida and Tennessee. Mowry was not responsible
16 for sales in California.

17 5. In addition to work-related travel in the Southeastern Territory, Mowry would have
18 been able to attend the annual Oracle Open World customer conference in San Francisco, California,
19 on two occasions during her tenure with the company. That conference is a 3-5 day event.

20 I declare under penalty of perjury under the laws of the United States of America and the
21 State of California that the foregoing is true and correct, and that this declaration was executed this
22 the 7th day of February, 2019, in London, England.

23
24 
Prince Varma

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28 Mowry - Prince
Varma Declaration